

# **APPENDIX 4:**

  

# **AGENCY & SYSTEM REVIEW FUNCTIONS**

## AGENCY & SYSTEM REVIEW FUNCTIONS

After the account profile has been entered and posted, the Federal Agency may choose to use one of the following options from the Account Functions Menu:

- < **Maximum Draw Amount Prompt:** The Federal Agency has the option of setting parameters that designate daily, monthly, quarterly and/or total maximum draw amounts for some or all of its accounts. The ASAP system will reject any payment requests made for an amount in excess of the limit.
- < **Agency Review Criteria Prompt:** The Federal Agency may set a threshold to specify that requests at or above a certain dollar amount for selected accounts be forwarded for Agency Review. The threshold can apply to a single account, all the accounts for a single Recipient Organization, or all the accounts established by the agency.

## GUIDANCE FOR INVOKING AGENCY REVIEW FUNCTIONS IN ASAP

The Agency Review features were developed in ASAP to provide a mechanism for Federal Agencies to better control Federal domestic assistance cash outlays for cash management purposes.

Federal Agencies are responsible for monitoring the ASAP accounts, performing cash management of funds, and taking the appropriate actions necessary to ensure the proper use of the accounts by the user organizations.

In evaluating the implementation of Agency Review and Maximum Draw Amounts, FMS recognized that Federal Agencies need to balance controlling cash outlays and ensuring compliance with grant awards, with the Cash Management Improvement Act and Treasury / State Agreements.

This Guidance is intended to assist Federal Agencies and Recipient Organizations in evaluating ASAP account transactions for compliance with good cash management practices.

**Purpose** - Agency Review and Maximum Draw Amounts are recommended for use at a Federal Agency's discretion for situations related to non-compliance with proper cash management and reporting requirements. Notification must be sent to the Recipient Organization prior to implementation.

1. Federal Agencies are responsible for managing grant programs. Since they have the responsibility of assuring compliance with good cash management practices, each Federal Agency will define the circumstances under which Agency Review and Maximum Draw Amounts are invoked. Consideration factors could include, but not be limited to, the dollar value of the grant award and the history of cash management performance by the Recipient Organization.
2. Both features are considered extreme measures to be instituted as a last resort for grantees. Federal Agencies should have extensive discussions with the Recipient Organization prior to any decision to place an account on agency review or maximum draw.
3. When invoking Agency Review features, the Federal Agency must regularly and routinely log on to ASAP throughout the day to review payment requests.

**Notification** - Federal Agencies must insure that Recipient Organizations receive notification 30 days prior to invoking Agency Review or Maximum Draw.

1. The notice will include, at a minimum, the date of the notice, the specific reasons why the Recipient Organization will be placed on Agency Review, the date the Agency Review feature will be invoked, the name and address of the Federal Agency authorizing official, and the name and phone number of a Federal Agency contact.
2. The notification will be sent to the primary contacts identified in the Recipient Organization and Payment Requestor profiles in the ASAP system.
3. Recipient Organization appeals related to the decision should be in writing and addressed to the Federal Agency authorizing official.

4. When Agency Review or Maximum Draw Amounts are invoked for an ASAP account; the ASAP system automatically generates an immediate system notification to the recipient organization advising the Agency Review and/or Maximum Draw Amount feature is in effect. Any changes to an Agency Review or Maximum Draw Amount parameter will also generate an ASAP system notification.

**CMIA Implications** - Federal Agencies who plan to use Agency Review and Maximum Draw Amounts shall be mindful of the Cash Management Improvement Act and regulations, the associated Treasury/State Agreements, grant award documents, the general financial positions of their recipients, and the relative fiscal impacts.

1. Timeliness of reviews by Federal Agencies is critical in order to minimize payment delays for recipients and avoid CMIA interest liabilities. Federal interest liabilities will accrue if payment delays result from the use of Agency Review.
2. States must submit specific documentation to support all Federal interest liability claims resulting from the use of Agency Review and/or Maximum Draw Amounts.

**Time frame** - Federal Agencies should review their decision to place Recipient Organizations under maximum draw and/or agency review every 90 days to determine the need to continue. If a Federal Agency decides to invoke these features for another 90-day period, it must notify the Recipient Organization at least 10 days prior to the end of each 90-day period.